



1005990

**WACKER SILICONES CORPORATION****RCRA Closure Plan****I. Tanks**

It is estimated that the tanks will require closure about the year 2001. Generally, tanks containing hazardous waste materials will be emptied to tank trucks for removal and disposal of contents. Only Michigan, US EPA, and Wacker-approved haulers will be used. Only US EPA and Wacker-approved disposers will be used.

Tanks and ancillary equipment will then be decontaminated by washing the tank, piping, pump, and associated equipment with three increments of water and industrial detergent. The washing agent will be recirculated and pumped by high pressure lance. Washings will be put in drums for disposal by an approved hauler and disposer.

The tanks, piping, and associated equipment will then be purged with air. The entire schedule of closure should take about 4 months.

The tanks can then be used to store hazardous wastes for periods less than 90 days.

An independent professional engineer will certify completion of the closure.

**II. Drum Storage**

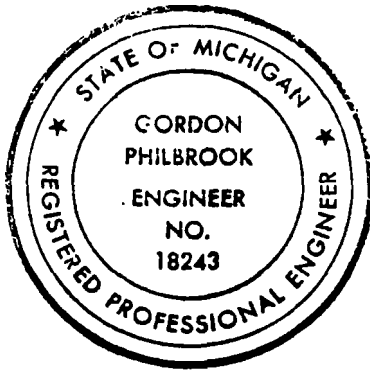
It is estimated that the storage pad will require closure in about the year 2021. Generally, drum storage areas will be emptied by the removal of the drums to an approved disposer. Only Michigan, US EPA and Wacker-approved haulers will be used. Only US EPA, Wacker and possibly Michigan-approved disposers will be used.

The drum pad will be washed with water and industrial detergent. Washings will be put in drums for disposal by an approved hauler and disposer, if contaminated. Otherwise, the washings will go to the chemical sewer. The entire schedule of closure should take about 3 months.

After thorough decontamination, the storage pad will be used for storage of hazardous wastes for periods less than 90 days.

An independent professional engineer will certify completion of the closure.

See attached forms for closure plan tanks and drum storage areas.



Certified by,

*Gordon C. Philbrook*

Gordon C. Philbrook  
Wacker Silicones Corporation  
Administrator, Environmental  
Regulations  
Professional Engineer  
State of Michigan  
PE 18243  
Revised: February 29, 1988

WACKER SILICONES CORPORATION

RCRA CLOSURE PLAN

Tanks

DATE Revised 2-29-88 TAG NO. T-101

CAPACITY 25,000 gallon MATERIAL OF CONSTRUCTION Steel

MAXIMUM USUALLY STORED 10,000 gallon

MISCELLANEOUS Horizontal; 200 PSIG pressure rating, 4"  
breathing vent with nitrogen pad

NATURE OF CONTENTS 1,1,1 trichloroethane waste solvent

UNLOADING METHOD Wilden pump through a GAF-type filter  
to a bulk truck

WHEN CLOSED Unknown; estimated in year 2001

CLOSURE COST \$5,830

WACKER SILICONES CORPORATION

RCRA CLOSURE PLAN

Tanks

DATE Revised 2-29-88 TAG NO. T-105

CAPACITY 14,000 gallons MATERIAL OF CONSTRUCTION Steel

MAXIMUM USUALLY STORED 9,000 gallons

MISCELLANEOUS Vertical; 3" vac/0.5 PSIG pressure rating,  
4" breathing vent w/nitrogen pad; 8" relief valve

NATURE OF CONTENTS Various Hibay ignitable waste solvents

UNLOADING METHOD Wilden pump through a GAF-type filter  
to a bulk truck

WHEN CLOSED Unknown; estimated in year 2001

CLOSURE COST \$6,690

WACKER SILICONES CORPORATION

RCRA CLOSURE PLAN

Tanks

DATE Revised 2-29-88 TAG NO. T-108

CAPACITY 14,900 gallon MATERIAL OF CONSTRUCTION steel

MAXIMUM USUALLY STORED 9,000 gallon

MISCELLANEOUS Vertical; 3" vac/0.5 PSIG pressure rating.

4" breathing vent w/nitrogen pad; 8" relief valve

NATURE OF CONTENTS RTV mineral spirits waste solvent

UNLOADING METHOD Wilden pump through a GAF-type filter

to a bulk truck

WHEN CLOSED Unknown; estimated in year 2001

CLOSURE COST \$6,690

WACKER SILICONES CORPORATION

RCRA CLOSURE PLAN

Drum Storage Area

DATE February 29, 1988 AREA 2,500 FT<sup>2</sup>

AREA DESCRIPTION Hazardous waste pad; east of Hibay area

MAXIMUM NUMBER OF DRUMS USUALLY STORED 500

WHEN CLOSED Unknown; estimated in year 2021

CLOSURE COST \$52,180

WACKER SILICONES CORPORATION

RCRA CLOSURE PLAN

TOTAL CLOSURE COST

T-101	\$ 5,830
T-105	6,690
T-108	6,690
East pad	<u>52,180</u>
Total	\$71,390

T-101

1. Sell 10,000 gallon (but, no credit)	\$ 0
2. Freight, 3x1,000	3,000
3. Cleaning solvent	1,320
4. Solvent disposal	400
5. Two (2) operators	850
6. Cleaning pump	<u>260</u>
Net Cost	\$5,830

T-105 (& T-108)

1. Haul by Systech 9,000 gal x \$0.50/gal	\$4,500 each
2. Cleaning solvent	800
3. Two (2) operators	800
4. Solvent disposal	330
5. Cleaning pump	<u>260</u>
Net Cost	\$6,690 each

Drum Pad

1. Remove drums 500 x \$100	\$50,000
2. Decontamination	<u>2,180</u>
Net Cost	\$52,180

WACKER SILICONES CORPORATION

RCRA CLOSURE PLAN

1989 ADDENDUM

1. Gross National Product inflation factor for 1988 is 1.034
2. Closure Cost = \$71,390 X 1.034 = \$73,820.

GCP

3/2/89



NOTE TO FILE

Re: Closure Plan -

1. SWS should have submitted its closure plan to the Regional Administrator (RA) by January 31, 1982 in order to comply with 40 CFR Part 265.112(c).
2. SWS's proposal to close the storage facility should have been subject to a public comment period under 40 CFR Part 265.112(d).
3. Hazardous waste containers should not have been removed from the old storage pad until after the RA approved the closure plan under 40 CFR Part 265.112(d).
4. Hazardous wastes should have been removed in accordance with the approved closure plan and the time frames specified under 40 CFR Part 265.113(a).
5. Closure should have been completed within the time frame specified in 40 CFR 265.113(c).
6. With these considerations, the "new" storage area technically does not have interim status, and should be considered as a new facility under 40 CFR 270.10(f).
7. However, since the modification to the facility did not represent a process design increase (SWS filed a letter with U.S. EPA on 8/27/82 - see Part A file - which apprised U.S. EPA of the situation), and since the change did not represent reconstruction of the facility under 40 CFR Part 270.72(e), U.S. EPA shall regard SWS' modification as an upgrading of the facility rather than as a formal Subpart G closure of an "old" storage pad with construction of a "new" storage pad.

CONCLUSION

Therefore, SWS will not have to formally close the "old" storage pad, under 265 Subpart G, since U.S. EPA views its transfer to another location with subsequent engineering improvements as an upgrading to the facility. Interim status is merely transferred to the upgraded active portion.

137-23  
I certify that the storage pad used for containment of hazardous waste containers appeared to meet the performance criteria of 40 CFR Part 264 - Subpart I on my site - inspection conducted on 10/13/83.

Allen A. Delms U.S. EPA  
3/13/84

# SWS Silicones Corporation

ADRIAN, MICHIGAN 49221 • TELEPHONE (517) 263-5711

February 28, 1984

Mr. Allen A. Debus  
United States Environmental Protection Agency  
Region V  
RCRA Activities, Part B Permit Application  
Technical, Permits and Compliance Section  
230 South Dearborn Street  
Chicago, Illinois 60604

RECEIVED  
MAR 02 1984  
WASTE MANAGEMENT  
BRANCH

Dear Mr. Debus:

As discussed recently, enclosed is a Partial Closure Plan for the old hazardous waste storage pad, which was in use up to July, 1982.

Please advise us how to proceed with this partial closure. If you have any questions, please contact me at the aforementioned number.

Yours truly,

SWS SILICONES CORPORATION

*Gordon C. Philbrook*

Gordon C. Philbrook  
Environmental Control Coordinator

GCP:pb certified  
84-45

cc: J. Calamungi  
G. L. Ford  
M. J. Reale  
T. J. Sayers

3/7/84  
Talked to H. Kim. Asked for  
max inventory at any one  
time of drum storage and last  
inventory of drums stored before  
closure.

*A. Debus*

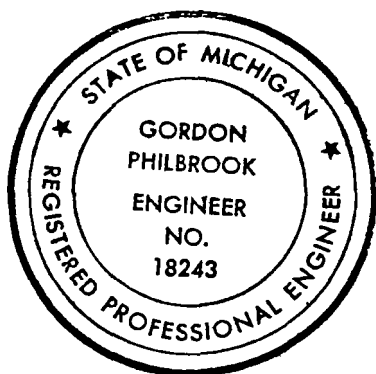
~~Process as closure~~  
Include in permit -  
closure plan -  
must identify materials  
old site as well

SWS SILICONES CORPORATION  
PARTIAL CLOSURE PLAN  
Old Hazardous Waste Storage Pad

Introduction

This concrete storage pad (30' x 50') was used to store hazardous and non-hazardous waste drums up to July, 1982. The location of this old pad is shown on the attached Figure 11. The waste classifications, which were stored on the pad, are shown on the attached Table 1.

- I. In August, 1982, SWS Silicones Corporation sent in a revised RCRA application which included EPA Consolidated Permit Application Forms 1 and 3. It was stated at that time that a new drum pad was now being used for storage of hazardous wastes.
- II. During the summer of 1982 and again during the summer of 1983, a contractor, Midwest Waterblasting, was hired to thoroughly clean the old drum pad with high pressure "Spin Jet" water. A copy of the 1983 purchase requisition and invoice is attached. Of course, all drums were removed from the pad and the pad was swept, before the water cleaning.  
The washwaters would have drained into the chemical sewer system, which handles the plant washwaters by oil skimming, settling, neutralization, equalization, aeration and biological activity, further settling, and discharge from the NPDES-approved outfall 001 to the River Raisin.
- III. To complete this partial closure, it is planned to have an independent professional engineer inspect the old drum pad area, verify the records, and certify that the closure is completed.
- IV. It is planned to continue using the old drum pad for storage of non-hazardous drum wastes.



Certified by:

*Gordon C. Philbrook*

Gordon C. Philbrook  
SWS Silicones Corporation  
Environmental Control Coordinator  
Professional Engineer  
State of Michigan  
PE 18243  
February 6, 1984

Figure 11

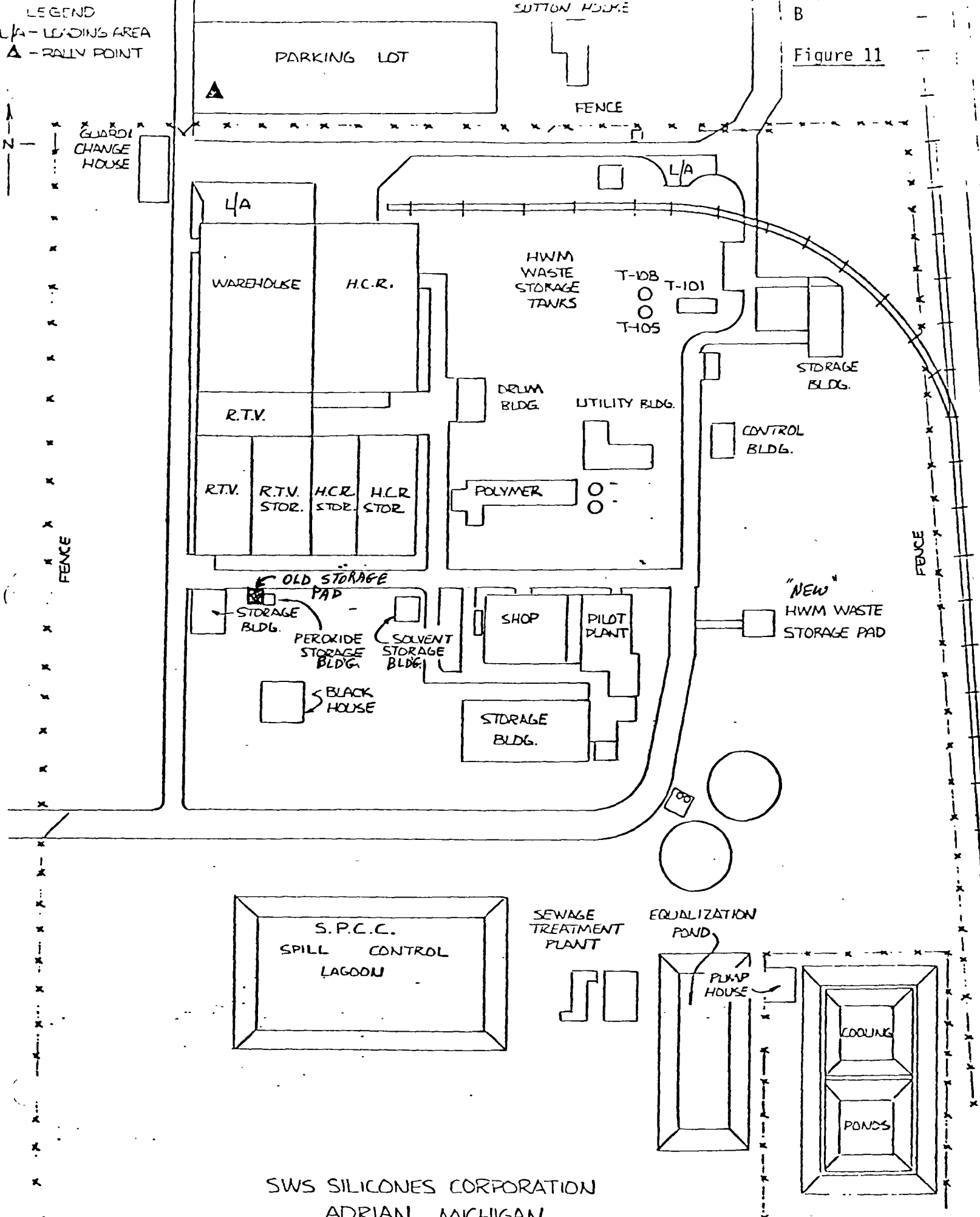


TABLE 1  
WASTES, ASSOCIATED HAZARDS, AND BASIS FOR HAZARD DESIGNATION

Waste	Hazard	Basis for hazard designation
<u>Drums</u>		
Mixed Alcohol	Ignitable Toxic	Tested flash point 68 - 77°F. Listed waste F003.
Hydrocarbon, Extremely Flammable	Ignitable	Tested flash point 25 - 34°F.
Hydrocarbon, Flammable	Ignitable Toxic	Tested flash point 68 - 77°F. Listed waste F003.
Hydrocarbon, Combustible	Ignitable	Tested flash point 104 - 113°F.
Flammable, Tech Center	Ignitable Toxic	Tested flash point 68 - 77°F. Listed waste F003.
Solvent Sump	Ignitable	Tested flash point 104 - 113°F.
Mineral Spirits	Ignitable	Tested flash point 104 - 113°F.
Polychlorohydrocarbon	Toxic	Listed waste F002.
Non-Combustible, Tech Center	Toxic	Listed waste F002.
ES-40 Lites	Ignitable	Tested flash point 68 - 77°F.
Cyclizer	Corrosive Ignitable	Has pH of >13. Tested flash point 122 - 131°F.
SWS-960	Ignitable	Tested flash point 59 - 68°F.
HCR Vent	Ignitable	Tested flash point 80 - 86°F.



INVO

11993 US-223

# Midwest Waterblasting

high-pressure waterblasting specialists  
— WET and DRY SAND —

Blissfield, Michigan 49228  
Telephone (517) 486-4326

S.P.S. Silicone Corporation  
Silicon Road  
Adrian, MI. 49221

ATT: Accounts Payable Dept.

(INVOICE DATE)

(OUR ORDER NUMBER)

Contr. # 95-11730

Ref. # 37357-N

(YOUR ORDER NUMBER)

A SERVICE CHARGE OF 1½% will be added  
to all accounts over 30 days.  
This is an annual percentage rate of 18%.

REQUESTED BY

Vicki Sharp

DELIVERY DATE

June 22, 1983

SALESMAN

Keith Gudney

TERMS

NET 30 DAYS

HOURS

DESCRIPTION

AMOUNT

WORK DONE:

High pressure cleaned cement floor in warehouse; using  
Spin Jet.

MACHINE CHARGES:

3 hours @ \$ 62.50/hr. (Spin Jet rate)

420.00

PERSONNEL:

3 hours @ \$ 28.00/hr. (time-laborer) \$ 84.00

3 hours @ \$ 36.50/hr. (time-laborer) \$ 109.50

\$ 210.00

TRAVEL TIME:

30 miles (trip) @ \$ 1.25/mi.

\$ 37.50

AMOUNT DUE THIS INVOICE .....

\$ 677.50\*

THANK YOU....



PROCESSED FOR PAYMENT

7/6/83  
Free approval

*[Handwritten signature]*

Note to Part A File

On March 8, 1984, I was informed that the old storage pad mentioned in Mr. Philbrook's letter of February 28, 1984, held about 300 drums of hazardous waste just prior to closure. This information was relayed by H. Kim, on 3/8/84.

Allen A. Delino

3/12/84